



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

April 21, 2025

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: U.S. v. Gonzales-Valdez et al., S1 25 Cr. 76 (MKV)

Dear Judge Vyskocil:

The Government respectfully requests that the Superseding (S1) Indictment in this matter be unsealed and that the Court schedule an arraignment and initial pretrial conference. The Government also respectfully moves for the exclusion of time under the Speedy Trial Act through the date of the initial pretrial conference. The exclusion of time is in the interest of justice because it will permit the Court to set an orderly schedule in this 21-defendant racketeering case, which involves some defendants who are expected to be arrested in multiple jurisdictions across the United States and who will need to be transported to the Southern District of New York. 18 U.S.C. § 3161(h)(1)(F), (h)(7)(A).

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

by: /s/
Jun Xiang / Kathryn Wheelock / Timothy Ly
Assistant United States Attorneys
(212) 637-2289 / -2415 / -1062

CC (ECF)

All Counsel of Record

GRANTED.

The Indictment in this matter is UNSEALED.

Arraignment in this matter is scheduled for April 30th at 11:30.

SO ORDERED.

Date: 4/21/2025
New York, New York

Mary Kay Vyskocil
United States District Judge